
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No. 18-29832
Carmen M D'Zela)	
)	Chapter 13
)	
Debtor(s))	Judge: Carol A. Doyle

RESPONSE TO DEBTOR'S MOTION

NOW COMES the Creditor, North River Properties, Inc., by its attorney, Nathaniel D.

Lawrence and for its response to debtor's motion to bar, it asserts as follows:

1. That the Creditor filed a proof of claim on January 7, 2019;
2. That unbeknownst to the Creditor, the proof of claim was required to be filed by Jan 2, 2019;
3. That the counsel for the Creditor learned of the bankruptcy on October 24, 2018, but never received any proposed plan or claim filing period from the debtor's counsel;
4. That as soon as the creditors counsel received information of a plan, he filed the proof of claim on the same day.

Wherefore Creditor, North River Properties, Inc., respectfully prays for a court order denying the debtor's motion or alternatively granting leave of court for the Creditor to file a claim *instantly*.

Nathaniel D. Lawrence
Lawrence & Morris
Attorney for Creditor
2835 N. Sheffield - #232
Chicago, Illinois 60657
773/880-2414
nlawrence@l-mlaw.com

North River Properties, Inc.

By:



Nathaniel D. Lawrence
Its Attorney